

IN THE UNITED STATES COURT OF APPEALS  
FOR THE FOURTH CIRCUIT

_____	)	
	)	
UNITED STATES OF AMERICA,	)	
<i>Plaintiff/Appellee,</i>	)	
	)	
v.	)	Case. No. 15-4633
	)	
LEONARD BENJAMIN,	)	
<i>Defendant/Appellant.</i>	)	
_____	)	

UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE APPELLANT'S  
OPENING BRIEF AND JOINT APPENDIX

Appellant Leonard Benjamin, by and through undersigned counsel, hereby moves pursuant to Federal Rule of Appellate Procedure 27 and Local Rule 31(c) for a four-week extension of time in which to file his opening brief and joint appendix in the above-captioned matter. In support thereof, counsel for Appellant states the following:

1. Appellant's opening brief and joint appendix are currently scheduled to be filed with this Court on or before March 1, 2016.
2. Undersigned counsel did not represent Appellant in the district court proceedings. Undersigned counsel has worked diligently for months in an attempt to obtain all of the relevant documents from prior defense counsel, however, several important documents still remain outstanding. In addition, since

undersigned counsel did not represent Appellant in the felony proceedings, the Clerk's Office of the District Court indicated that a court order is required to obtain additional copies. For that reason, undersigned counsel will need additional time to acquire the documents necessary to prepare and finalize the opening brief and joint appendix.

3. Counsel for the government consents to this request for an extension of time.

WHEREFORE, Leonard Benjamin respectfully requests that this Court grant his motion for a four-week extension of time, from March 1, 2016, until March 29, 2016, in which to file Appellant's opening brief and joint appendix, as well the related deadlines included in the current briefing order.

Respectfully submitted this 26<sup>th</sup> day of February, 2016.

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CERTIFICATE OF SERVICE

This is to certify that the foregoing Unopposed Motion for Extension of Time to File Appellant's Opening Brief and Joint Appendix was filed via CM/ECF, which automatically sends notice of such filing to:

Michael Hanlon  
Assistant U.S. Attorney  
Office of the U.S. Attorney  
36 South Charles Street  
Baltimore, Maryland 21201

on this 26<sup>th</sup> day of February, 2016

\_\_\_\_\_/s/\_\_\_\_\_  
Susan Hensler  
Attorney for the Appellant